

Exhibit 31

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**QUADROS & ASSOCIATES, P.C.**

ATTORNEYS AT LAW  
2715 HUNTINGTON AVE.  
NEWPORT NEWS, VIRGINIA 23607

(757) 244-4611  
FAX (757) 244-4631

ROBERT P. QUADROS  
RAYMOND B. BACON

October 26, 2009

Rex Davis, Clerk  
Newport News Circuit Court  
2500 Washington Avenue  
Newport News, VA 23607

RE: Jones, Blechman, Woltz & Kelly, PC v. Nikolai I. Sinkine  
Case No. CL0901007V-04  
Our File No. 177594.001

Dear Mr. Davis:

With regard to the above matter enclosed please find an *Opposition to Motion to Intervene by Tatyana Babakaeva as a Co-Defendant* and a *Motion to Set Trial Without a Jury*, which I respectfully request you file on behalf of the plaintiff in this matter.

Also enclosed is a *Notice of Hearing*, which I request you file on behalf of the plaintiff to place this matter on the Court's docket for December 15, 2009 at 9:00 a.m. before the Honorable Timothy S. Fisher, Judge.

I certify that I mailed a copy of this correspondence this date to defendant Nikolai I. Sinkine at his last known address of 28 Kincaid Lane, Hampton, VA 23666 and to Tatyana Babakaeva at her last known address of 2124 Criston Drive, Newport News, VA 23602. A copy of the Notice of Hearing will also be served on Nikolai I. Sinkine and Tatyana Babakaeva via the appropriate sheriff.

Thanking you in advance for your attention to this matter, I am

Very truly yours,

Quadros & Associates, P.C.

Robert P. Quadros

RPQ/sjp  
Enclosures

cc: Jones, Blechman, Woltz & Kelly, PC  
Nikolai I. Sinkine  
Tatyana Babakaeva ✓

**VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS**

Jones, Blechman, Woltz & Kelly, P.C.,  
Plaintiff

v.

Nikolai I. Sinkine,  
Defendant

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Case No. CL0901007V-04

**OPPOSITION TO  
MOTION TO INTERVENE BY TATYANA BABAKAEVA AS A CO-DEFENDANT**

Comes now your Plaintiff, Jones, Blechman, Woltz & Kelly, P.C., by counsel, and opposes the Motion of Tatyana Babakaeva to intervene as a Co-Defendant and states as follows:

1. That the said Tatyana Babakaeva is not a party to this action, nor was a party to the contract between the Plaintiff and Defendant, nor has any say in the relationship between Plaintiff and Defendant.
2. Said Tatayana Babakaeva was represented by other counsel during the pendency of the action styled *Nikolai I. Sinkine v. Tatyana A. Babakaeva*.

**WHEREFORE**, your Plaintiff opposes any attempt by this party to intervene in this action.

Jones, Blechman, Woltz & Kelly, P.C.

By: \_\_\_\_\_

Of Counsel

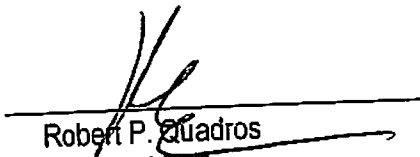
Robert P. Quadros, VSB #14402  
Raymond B. Bacon, VSB #35376  
Quadros & Associates, P.C.  
2715 Huntington Avenue  
Newport News, VA 23607  
(757) 244-4611  
#177594.001

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24 day of October, 2009 a true and accurate copy of the foregoing Pleading was mailed to:

Nikolai I. Sinkine  
28 Kincaid Lane  
Hampton, VA 23666  
Defendant

Tatyana Babakaeva  
2124 Criston Drive  
Newport News, VA 23602



Robert P. Quadros  
Raymond B. Bacon  
Quadros & Associates, P.C.  
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Newport News, VA 23607  
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**VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS**

Jones, Blechman, Woltz & Kelly, P.C.,  
Plaintiff

v.

Nikolai I. Sinkine,  
Defendant

Case No. CL0901007V-04

SERVE: Nikolai I. Sinkine  
28 Kincaid Lane  
Hampton, VA 23666

SERVE: Tatyana Babakaeva  
2124 Criston Drive  
Newport News, VA 23602

**NOTICE OF HEARING**

PLEASE TAKE NOTICE that on December 15, 2009 at 9:00 a.m. the undersigned, by counsel, will appear at the Newport News Circuit Court, Courtroom #5, located at 2501 Huntington Avenue, Newport News, VA, before the Honorable Timothy S. Fisher, Judge, pursuant to its *Opposition to Motion to Intervene by Tatyana Babakaeva as a Co-Defendant* and its *Motion to Set Trial Without a Jury*.

PLEASE GOVERN YOURSELF ACCORDINGLY.

Jones, Blechman, Woltz & Kelly, P.C.

By: 

Of Counsel

Robert P. Quadros, VSB #14402  
Raymond B. Bacon, VSB #35376  
Quadros & Associates, P.C.  
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Hampton, VA 23666  
Defendant

Tatyana Babakaeva  
2124 Criston Drive  
Newport News, VA 23602

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